

CIVIL RIGHTS EDUCATION AND ENFORCEMENT
CENTER

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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

FRANCIE E. MOELLER *et al.*,

Plaintiffs,

v.

TACO BELL CORP.,

Defendant.

Case No. C 02 5849 PJH NC

**DECLARATION OF TIMOTHY P. FOX IN
SUPPORT OF UNOPPOSED MOTION FOR
FINAL APPROVAL OF CLASS
SETTLEMENT**

Date: September 24, 2014

Time: 9:00 a.m.

**The Honorable Phyllis J. Hamilton
Courtroom 3, 3rd Floor**

I, Timothy P. Fox, do hereby declare as follows:

1. I represent the Plaintiffs and class in the above captioned case. I am co-founder of the Civil Rights Education and Enforcement Center ("CREEC"). I have personal knowledge of the facts set forth in this Declaration, and if called upon to testify, I could competently testify to the truth of these matters.

2. No later than June 11, 2014, the approved class-action notice was posted in PDF and Word format on www.TacoBellclassaction.com, the website established by class counsel for this case.

3. On June 11, 2014, I sent an email to over 60 email addresses of disability rights organizations across California, providing them with the approved notice, asking that they print it and post it at their organizations, and requesting that they circulate it to their members with a link to the case website on which the notice was posted.

4. By the close of business on June 13, 2014, I sent the approved notice by email to 1804 people who are potential class members in this case.

5. In response to the class notice, Sharon Powers filed a letter with this Court, in which she complains about conditions in a Taco Bell restaurant located at 40660 Grimmer Boulevard in Fremont, California. *See* ECF 801. That restaurant has never been covered by this class action, which is limited to California Taco Bell restaurants operated by Taco Bell Corp.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

CIVIL RIGHTS EDUCATION AND
ENFORCEMENT CENTER

August 29, 2014

/s/ Timothy P. Fox
Timothy P. Fox